

Before the  
**Federal Communications Commission**  
Washington, D.C. 20554

In the Matter of	)	
	)	
Implementation of 911 Act	)	WT Docket No. 00-110
	)	
The Use of N11 Codes and Other Abbreviated	)	CC Docket No. 92-105
Dialing Arrangements	)	
	)	
To: The Commission		

**ALLTEL CORPORATION**  
**PETITION FOR EXTENSION OF FIRST TRANSITION REPORT**

Pursuant to Sections 1.3 and 1.925 of the Commission's rules, 47 C.F.R. §§ 1.3, 1.925, ALLTEL Corporation ("ALLTEL") hereby requests an extension of the March 11, 2002 date for submitting its first transition report on its implementation of the 911 Act until April 11, 2002.<sup>1</sup> For the reasons discussed below, the underlying purpose of the reporting requirement would not

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<sup>1</sup> See *Implementation of the 911 Act, The Use of N11 Codes and other Abbreviated Dialing Arrangements*, CC Docket No. 92-105, WT Docket No. 00-110, *Fifth Report and Order, First Report and Order, and Memorandum Opinion and Order on Reconsideration*, FCC 01-351, ¶¶ 43-44 (rel. Dec. 11, 2001) (collectively, "*Order*"), 67 Fed. Reg. 3621 (Jan. 25, 2002); Public Notice, *Carrier Transition Reports for Implementation of the 911 Abbreviated Dialing Code Pursuant to the Wireless Communications and Public Safety Act of 1999 (911 Act)*, DA 02-507, CC Docket No. 92-105, WT Docket no. 00-110 (March 1, 2002). The March 11, 2002 date is not codified in the Commission's rules and it is unclear whether the instant waiver request is required in the first instance. ALLTEL is nevertheless filing this request out of an abundance of caution and to provide the Commission assurance that the objectives of the March 11th Report, as well as ALLTEL's ultimate compliance with its obligations under the 911 Act, will not be compromised.

be served or would be frustrated by application to the instant case, and grant of the requested extension would be in the public interest.<sup>2</sup>

Consistent with the Commission's intent in adopting the requirement, ALLTEL has already commenced the transition to 911 dialing where 911 is not currently in use and is identifying potential problems. ALLTEL must compile the information requested in the *Order* for its wireline and wireless services, many of which have service areas which do not overlap or which only partially overlap. ALLTEL has determined generally, for its wireless switches, that it translates dialed 911 digits to a 10-digit POTS number and routes the call to an appropriate PSAP. For wireline 911 calls, where the county does not have 911 service, the current practice is generally to provide a recorded message informing the caller that 911 service is not provided in that local jurisdiction.

ALLTEL is still identifying the precise 911 call termination points in each of the applicable counties listed in the *Order*. Obtaining this data at the level of granularity requested by the Commission, however, has proven more time-consuming than anticipated. In order to report this information accurately to the Commission, ALLTEL must obtain it manually via individualized inquiries to the respective jurisdictions. The additional time to compile the information will ensure that a company officer can genuinely certify as to its accuracy and that the report will be as useful as possible to Commission staff.

ALLTEL does not believe that a significant extension of time is warranted and seeks only a limited, one-month extension of the March 11, 2002 date. Moreover, ALLTEL will endeavor to submit the report to Commission staff as far in advance of the requested April 11, 2002 extension date as is possible. Importantly, ALLTEL does not at this point foresee problems in

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<sup>2</sup> 47 C.F.R. § 1.925(b)(3)(i).

complying with the 9-month transition date of the 911 Act, and no extension of the September 26, 2002 reporting date is anticipated. Thus, the Commission's ultimate objective of the reporting requirements – "ensuring that the transition has been completed in all relevant areas in a timely fashion consistent with the Commission's rules" – will not be undermined.

For the foregoing reasons, waiver of the March 11, 2002 date for submitting the first transition report is warranted.

Respectfully submitted,

ALLTEL CORPORATION

By: /s/ Glenn S. Rabin /s/  
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March 11, 2002